



CONFIDENTIAL

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

TREVOR FITZGIBBON,

PLAINTIFF

vs.

JESSELYN A. RADACK,

DEFENDANT

Civil Action No. 3:18-cv-247-REP

**DEFENDANT'S SUPPLEMENTAL RESPONSES TO PLAINTIFF'S
INTERROGATORIES**

3. Identify all persons (including individuals, sole proprietorships, associations, trusts, partnerships, limited liability companies, and corporations) whose homes or offices are known or believed to be in Virginia, and with whom Radack transacted any business between April 13, 2015 and the present, and PRODUCE a copy of all contracts, agreements, invoices and billing records relating to such business.

Response: John Kiriakou and Said Barodi.

4. Identify and PRODUCE copies of records of all telephone calls made by Radack (from any land line, cell phone or computer) and all text messages sent by Radack (from any telephone, computer, iPad, Blackberry or other electronic device) to any person known or believed to be in Virginia or to area codes 276, 434, 540, 571, 703, 757 and/or 804 between April 13, 2015 and the present relating to any business, either actual (ongoing or completed) or prospective.

Response to request as modified by Court order:

/15	Client 1
15	Client 1
/15	Client 1
/15	Client 1
/15	Client 1
/15	Client 1

15	Client 1
7	Client 1
17	Client 1
17	Client 1
17	Client 1
17	Client 1
9/17	Client 1
0/17	Client 1

5. Identify and PRODUCE copies of all email communications between Radack and any person known or believed to be in Virginia between April 13, 2015 and the present relating to any business, either actual (ongoing or completed) or prospective.

Response to request as modified by Court order:

18	Client 1
/18	Client 1
/18	Client 1
/18	Client 1
/18	Client 1
7/17	Client 1
/17	Client 1
/17	Client 1
/17	Client 1
/17	Client 1
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17	Client 1
/17	Client 1
17	Client 1
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0/16	Client 1
5/16	Client 1
/16	Client 1
/16	Client 1

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7/17	Client 2
/17	Client 2
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17	Client 2
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17	Client 2
17	Client 2
7/16	Client 2
/16	Client 2
9/16	Client 2
2/16	Client 2
/16	Client 2
/16	Client 2
/16	Client 2
/16	Client 2
/16	Client 2

6. Identify the number of times Radack and/or her agents, representatives and/or employees have been physically present in Virginia between April 13, 2015 and the present, and, for each occasion, describe in detail (a) the reason for being in Virginia, (b) the nature of any business activity conducted in Virginia, and (c) the location and duration of each visit.

Response to request as modified by Court order: Zero times.

I, Jesselyn Radack, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: 6/27/18

Jesselyn Radack
Jesselyn Radack